

EXHIBIT B
TO DECLARATION OF MICHAEL N. EDELMAN
IN SUPPORT OF PLAINTIFF ADVANCEME, INC.'S
MOTION FOR SANCTIONS
AGAINST DEFENDANT FIRST FUNDS, LLC

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July 3, 2007

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VIA E-MAIL

Joseph D. Gray
Vinson & Elkins LLP
2801 Via Fortuna, Suite 100
Austin, Texas 78746-7568

Re: *AdvanceMe v. RapidPay LLC, et al.*, Case No. 6:05-CV-00424 (LED) (E.D. Tex.)

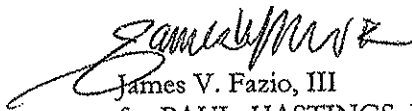
Dear Mr. Gray:

I write to follow up on the Court's July 2, 2007 Order in which Judge Davis ordered (among other things) First Funds to conduct a supplemental search of its files and to produce to AdvanceMe all documents relevant to the claims and defenses pleaded in this case (Civ. No. 6:05-CV-00424) or the companion *AmeriMerchant* case (Civ. No. 6:06-CV-0082), including but not limited to all documents responsive to the 83 categories of documents requested by AdvanceMe in our July 12, 2006 letter to Hilary Preston, and all documents related to AdvanceMe's damages claim.

As just one example of the deficiency in First Funds' document production, we have received and reviewed the documents produced by First Funds to date, and they appear to contain just a scant few program agreements. However, Request Nos. 1-4 in AdvanceMe's July 12, 2006 letter sought *all* contracts and agreements between First Funds and any merchant, guarantor, processor or entity who loaned or advanced money to a merchant processor under First Funds' Rapid Cash Advance Program.

With the close of fact discovery fast approaching, please confirm by July 5 that First Funds will complete its production and compliance with the Court's July 2, 2007 Order by July 12.

Sincerely,



James V. Fazio, III
for PAUL, HASTINGS, JANOFSKY & WALKER LLP

JVF:dkm